

more than that.⁷⁵⁹ Ickes also testified that Fowler asked that Ickes “get back to” Fowler after checking into the matter,⁷⁶⁰ but that Ickes did nothing to ensure that he or his staff followed-up with Fowler.

There is little evidence, and no direct evidence, that Fowler asked either Ickes or the Interior official with whom Fowler spoke to influence the Hudson decision in any meaningful or substantive way. Moreover, although Fowler did mention to Ickes that the opponent tribes were Democratic supporters, there is no direct evidence Fowler asked Ickes or the Interior official to take any official action in exchange for, or even in direct connection with, campaign contributions to the DNC. It is, of course, difficult to accept Fowler’s contention that he did not understand that each of his meetings with the tribal representatives related in some way to fund-raising. It is also difficult to escape the conclusion that Fowler, David Mercer and O’Connor all understood that the opponent tribes and their representatives were pursuing a substantive agenda at the time of these fund-raising efforts. Fowler’s actions in the matter – contacting Interior and the White House about a pending substantive matter before Interior on behalf of DNC contributors – certainly heightened the appearance of possible corruption. Indeed, Fowler’s actions were in conflict with the DNC’s own “Legal Guidelines for Fund-raising,” which admonished DNC Finance staff against linking donations to access to, or favors from, any Administration official or agency.⁷⁶¹ While Fowler testified, and the DNC General Counsel

⁷⁵⁹Ickes G.J. Test. at 145.

⁷⁶⁰*Id.* at 147.

⁷⁶¹For a more comprehensive discussion of the DNC guidelines and their applicability to Chairman Fowler, *see* Section II.E.2.h.1., *supra*.